

Exhibit A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO**

LANCE POUGH,

Plaintiff,

v.

MIKE DEWINE, et al.,

Defendants.

Case No. 2:21-cv-00880-MHW-CHG

Judge Michael H. Watson

Magistrate Judge Caroline H. Gentry

DECLARATION OF JEREMY PELZER

I, Jeremy Pelzer, hereby declare as follows:

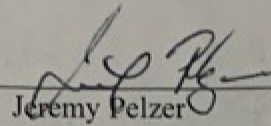
1. I currently live in Columbus, Ohio and work as a Politics Reporter for Cleveland.com/Advance Ohio.
2. I am in receipt of a deposition subpoena issued in this case by plaintiff Lance Pough, a copy of which is attached to this motion as Exhibit B (the “Subpoena”). That Subpoena requires me to appear for a deposition on July 28, 2023.
3. I am the author of the January 23, 2019 article titled “Ohio Parole Board is secretive and ‘frighteningly unfair,’ former member Shirley Smith says” (the “Article”), versions of which are attached as Exhibits A and A1 to the Subpoena.
4. Exhibits A and A1 to the Subpoena are true and accurate copies of the Article.
5. I do not have any firsthand knowledge of any of the facts reported in the Article, or any facts relating to Mr. Pough, his criminal case, or decisions relating to his parole.
6. The quotations in the Article accurately reflect the statements made to me by the sources identified in the Article.
7. I have no documents or other information relating to Mr. Pough or decisions relating to his parole.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: July 24, 2023

By

:

A handwritten signature in dark ink, appearing to read "J. Pelzer", is written over a horizontal line.

Jeremy Pelzer